

March 24, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Contreras v. Looptify, Inc.; Case No. 1:21-cv-9429-LGS

Dear Judge Schofield:

We represent plaintiff Yensy Contreras (“Plaintiff”) in the above-referenced action. We write, along with counsel for defendant Looptify, Inc. (“Defendant” and, together with Plaintiff, the “Parties”) in response to the Court’s March 23, 2022, Order.

Defendant filed a Pre-Motion Letter for an anticipated motion to dismiss on January 28, 2022 and Plaintiff then filed an amended Complaint on February 25, 2022. Since that time, the Parties have been actively engaged in settlement discussions, have agreed to exchange certain information in furtherance of that effort, and are in the process of exchanging such information. The Parties believe there is a reasonable prospect for settlement of this matter.

However, should the Parties not be able to resolve this case before April 18, 2022, Defendant intends to file a motion to dismiss or an answer by that date, with Plaintiff filing an opposition to a motion to dismiss on or by May 9, 2022.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Jarrett S. Charo

Jarrett S. Charo

MIZRAHI KROUB LLP

200 Vesey Street, 24th Floor

New York, NY 10281

(202) 595-6200

jcharo@mizrahikroub.com

Counsel for Plaintiff, Yensy Contreras

Hon. Lorna G. Schofield

/s/ Niraj J. Parekh

Niraj J. Parekh

BARNES & THORNBURG LLP

445 Park Ave., Suite 700

New York, NY 10022-8634

(646) 746-2016

niraj.parekh@btlaw.com

Counsel for Defendant Looptify, Inc.

cc: All Counsel of Record (via ECF)